

## Garcia, Daniela

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**From:** Marc Esser <marc@negawattconsult.com>  
**Sent:** Monday, May 22, 2017 12:55 PM  
**To:** Garcia, Daniela  
**Cc:** Bo White  
**Subject:** [EXTERNAL] Re: Re: FW: WS Bath & Shower Diverter Next Steps

Thanks Daniela, that all sounds good.

Let me get organized a bit, and when Bo is back next week we'll work on a plan of action for both the NOI and the T20 project. Does it make sense to try and be semi-ready with that by 6/1 in case any side conversations with the CEC develop? Or is that a different group at the CEC altogether? The analyst in charge per the slides was Jessica Lopez; I don't know her, do you?

Re budget & tracking, does it make sense to keep the NOI / Watersense under Advocacy, or do you feel it's so closely related to T20 that we should bundle it? Bundling is easier to track for us, but that doesn't have to be the determining factor.

Marc

On Mon, May 22, 2017 at 12:23 PM, Garcia, Daniela <[DGarcia3@semprautilities.com](mailto:DGarcia3@semprautilities.com)> wrote:

Hi Marc,

Thank you for your quick reply! I agree, I think taking this on now will be very beneficial to our work for the CASE Report. As far as the timeframe I think we can work with Stephanie Tanner at Water Sense. Mary stated she is the contact and if we are friendly with our approach she is very good to work with and we can work out the details for the dates with her. The product is already in the CEC database so that may help with whether we need lab work etc.

So I think it's good to say I will let Mary know Negawatt/SoCalGas will take the lead on the NOI.

Please let know if you have any questions or concerns and we can check on a status update when you have made some progress. I will set a reminder to check in with you but please feel free to reach out if you need to touch base.

Thank You,

*Daniela Garcia*

SoCalGas Customer Programs

Project Manager – Building Codes and Appliance Standards

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**From:** Marc Esser [mailto:[marc@negawattconsult.com](mailto:marc@negawattconsult.com)]  
**Sent:** Monday, May 22, 2017 11:39 AM  
**To:** Garcia, Daniela <[DGarcia3@semprautilities.com](mailto:DGarcia3@semprautilities.com)>  
**Cc:** Bo White <[bo@negawattconsult.com](mailto:bo@negawattconsult.com)>  
**Subject:** [EXTERNAL] Re: FW: WS Bath & Shower Diverter Next Steps

Hi Daniela,

Sarah's document is good executive summary & high level action plan of the issue. The next steps proposed in Mary's email are verbatim from that document.

if you'd like for us to take over the project and the response to the NOI, I think we might as well do it now. If we let Energy Solutions respond, IMHO there will be some unnecessary overhead.

- anyone wanting to have a dialogue about the response will reach out to them first, while we'll be in charge at some point.
- we'll be in a better position to have that dialogue, if we write the response and do the research ourselves.
- we may have other/more comments than they have drafted so far.

I agree with Sarah's next steps and proposed comments at a high level; in particular, there is a critical path item of figuring out whether lab work is needed. If that's the case, there will not be enough time to produce all the answers by "June/July". We could have a research plan for those questions ready, that would align with the Title 20 work for the CEC.

Marc

On Mon, May 22, 2017 at 8:33 AM, Garcia, Daniela <[DGarcia3@semprautilities.com](mailto:DGarcia3@semprautilities.com)> wrote:

Marc,

Mary passed this along regarding where Energy Solutions is at with Tub Spout Diverters. Can you please review the attachment and her email. There is NOI that was issued by Water Sense that is pending a response. The NOI is an open process so there isn't a defined comment period. See email in attachment (pg.8) from March stating they had a few months.

Based on the timing I can have Mary let Energy Solutions respond to this NOI or we can take it from here. Please let me know your thoughts at the earliest.

*Daniela García*

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**From:** Anderson, Mary [mailto:[M3AK@pge.com](mailto:M3AK@pge.com)]  
**Sent:** Thursday, May 18, 2017 11:23 PM  
**To:** Garcia, Daniela <[DGarcia3@semprautilities.com](mailto:DGarcia3@semprautilities.com)>  
**Subject:** [EXTERNAL] FW: WS Bath & Shower Diverter Next Steps

Daniela,

I just debriefed with ES. They haven't completed the analysis on the tub spout diverters. Water Sense has issued a Notice of Intent (attached) and we need to respond to the questions outlined in the NOI. Here are the ideas on how to respond to the NOI. We can have Negawatt respond or I can have Energy Solutions respond. It is up to you. Let me know if you have questions. Thanks!

Mary

### **Next Steps**

- We will conduct more research to answer EPA's questions they outlined in the NOI, including outreach to industry experts (e.g., test labs, NRDC, manufacturers, water utilities) who may provide input on scope, testing, labeling, marketing etc.
  
- We will reach out to test labs (see below table) to inquire about conducting a series of tests to determine:
  1. the appropriate savings factor(s) across a range of real-world scenarios, as requested by EPA,
  2. if the life-cycle test should be increased from 15,000 cycles to perhaps 20,000 or 25,000 cycles to better reflect product durability and lifetime, and
  3. how various factors (e.g., water hardness, water pH) could potentially cause a bath and shower diverter to leak in real-world applications, as requested by EPA.

The amount of time and cost it will take to conduct testing may pose a challenge in submitting data to EPA in a timely manner. As such, we will try to obtain information on test time and cost from the test labs as soon as possible.

- We will work in collaboration with NRDC, as they have been involved in the WaterSense diverter process and they are well-connected in the industry. We have already been in preliminary discussions with Ed Osann of NRDC with respect to the potential Title 20 update for tub spout diverters. Also, Mr. Osann previously spoke with Gauley Associates to conduct life-cycle testing of diverters, and so we plan on contacting them about potential testing.

Plumbing Fittings Test Labs

Company	Location	Notes
Gauley Associates	Canada	Recommended by NRDC. Works closely with John Koeller of MaP Testing
BR Laboratories, Inc.	Huntington Beach, CA	CEC-Approved Test Lab
IAPMO R&T Laboratory	Ontario, California	CEC-Approved Test Lab
Pfister - Spectrum Brands Hardware and Home Improvement	Lake Forest, CA	CEC-Approved Test Lab
U.S. Analytical Laboratories	Fullerton, CA	CEC-Approved Test Lab

Thank you,

Sarah

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